

Testimony of  
Roger Cohen, President of the Regional Airline Association  
Before the U.S. Committee on Commerce, Science and Transportation  
**Aviation Safety: The Role and Responsibility of Commercial Air Carriers and Employees**  
June 17, 2009

Good morning Mr. Chairman, Senator Hutchison, and Members of the Committee. My name is Roger Cohen. I am the President of the Regional Airline Association. Our 31 member airlines carry more than 90 percent of the passengers traveling on regional aircraft.

The circumstances that prompted the Committee to convene today's hearing are tragic. We share the Committee's concern for the lives of the passengers and crews that have been lost and the grief suffered by their families and loved ones.

The challenge now facing this Committee, federal aviation safety agencies, and the aviation industry is to review all of the issues and take whatever steps are necessary to prevent accidents in the future.

We appreciate the open lines of communication this Committee has kept with our industry, including the opportunity to meet with Aviation Subcommittee Chairman Dorgan to share our thoughts in advance of this hearing as well as the opportunity to include our members in a survey of commercial airline safety programs and industry best practices. We hope you find this continuing dialogue to be as valuable as we do.

Federal safety statistics clearly show that flying is the safest mode of travel. A person is far more likely to have a fatal accident traveling in a car, train, or bus than traveling by air. According to the National Safety Council, the fatality rate for cars is 7,700 percent higher than for commercial aircraft and the fatality rate for trains and buses is 300 percent higher. This remarkable safety record is the result of decades of dedicated work from aviation safety professionals, both in the government and in the industry.

Nevertheless, the pursuit of improved aviation safety is a shared and continuous effort, to which regional airlines are committed, along with everyone else in the commercial airline industry. The industry's overarching goal has been and always will be zero accidents and zero fatalities. We are committed to working with Congress, the FAA, the NTSB, and aviation safety experts in academia to ensure that we can meet this goal.

Mr. Chairman, for the purposes of aiding this Committee with its inquiry, our testimony will focus on two broad areas.

First, we will take a few moments to reacquaint the Committee with the regional airline industry. Anyone who has done background research on the industry prior to this hearing would have found a large number of inaccuracies portrayed in the media, and such misconceptions will not help the Committee carry out its responsibilities.

Second, we will talk about the steps regional airlines have already taken and the actions they plan to take to even further intensify their focus on aviation safety. The regional airlines are launching a new initiative to advance industry safety standards. We also believe that Congress can provide additional safety tools for the industry.

## Regional Airlines

Regional airlines operate regional jets or turboprop aircraft ranging in size from about 10 to 100 seats and provide scheduled passenger service on short- and medium-haul routes that connect more than 600 smaller towns and mid-size cities to each other as well as to the nation's major hub airports. This network offers passengers seamless service to almost every community in the country and many around the globe, serving 160 million passengers last year.

Shorter flights to less heavily populated areas on smaller aircraft should not be equated with fewer flights or limited reach. Over the last 20 years, the industry has worked to match aircraft size to the market, leading to vast improvements in service to many communities that would otherwise not have air service. Today, more than 50 percent of all scheduled flights are operated by regional airlines and three out of every four commercial airports in the United States are served exclusively by regional airlines.

Regional airlines operate in full partnership with major airlines. Indeed, major airlines either contract with regional airlines to provide service on selected routes or have an ownership stake in regional airlines.

In this relationship, a regional airline is responsible for providing the crew and maintaining the aircraft. The major airline, for which the regional carrier is providing service, determines flight schedules and fares and sets customer service standards.

From the passenger's perspective, the brand of the major airlines is in full view throughout the travel experience. In most cases, the passenger buys the ticket from the major airline, typically checks in at the major airline's counter, may find the in-flight magazine of the major airline, and may even sip a beverage placed on the cocktail napkin of the major airline.

Regional airlines and their major airline partners operate as a single, integrated system. The notion of two separate systems is a misconception.

That misconception extends to safety standards and it needs to be corrected if Congress is to have an accurate grasp of the situation. The fact is that all carriers are subject to the same strict FAA safety standards and requirements and receive the exact same level of safety oversight, notwithstanding so many erroneous press accounts.

***Pilot Qualifications.*** Regional airline pilots are subject to the same training requirements that apply to pilots working for major carriers. The rules are the same for all airlines.

Pilots must complete rigorous classroom and simulator training and regularly pass extensive flight checks given by FAA-approved examiners throughout their careers. Each and every check tests a pilot's knowledge and ability to perform both routine and emergency procedures. Each and every question, procedure and maneuver must be executed fully to FAA standards. Unlike many professional tests, the checks that airline pilots must complete are unforgiving. What this means is that airline pilots must complete every aspect of their flight check successfully, in effect scoring a grade of 100 percent, or they cannot fly for the airline. If any aspect of the flight check is not passed, the pilot must receive remedial training and successfully complete a re-check before being allowed to fly again.

The FAA also requires pilots to be separately trained and qualified on every type of airplane that they will be operating.

Regional airlines comply with these strict safety standards and regularly operate under internal standards above and beyond FAA requirements. For example, the average experience of the RAA member airline flight crews is 3075 total flight hours for first officers and 8500 for captains, which far exceed the FAA minimum requirements of 500 and 1500 hours, respectively.

***Pilot Background Checks.*** All airlines conduct in-depth background and safety checks on pilots before they are hired. Two separate sources are consulted.

The FAA maintains a database of pilot information established by the Pilot Records Improvement Act of 1996 or PRIA. This database includes information about a pilot's certificates, ratings, medical status and any rule violations for the previous five years. In addition, this law requires airlines to contact the pilot's previous airline employer to obtain information about his or her training performance, drug and alcohol tests, and employment status. FAA maintains a separate database, not subject to the PRIA law, which includes a pilot's history of FAA check ride disapprovals. Certainly, integrating a real-time database containing all pilot records would improve access to this vital information.

***Pilot Fatigue.*** Rested, alert, and focused pilots are essential for aviation safety. All parties – the FAA, airlines, and pilots – have a role to play in ensuring that pilots are well rested.

The FAA has rules in place to avoid fatigue. These rules apply to all pilots and all airlines.

- Pilots cannot fly more than 100 hours per month. In practice, pilots typically fly less than that – 80 to 82 hours during a month.
- Pilots can fly no more than eight hours per day.
- Pilots are required to get at least nine hours of time off between trips.

All airlines construct their pilot schedules in strict adherence to federal rest rules. In addition, many airlines have agreements with their pilot unions, further limiting the length of their scheduled working days. Computers are used to track pilots' flight and duty time to ensure that they are working within the FAA rest rule limits. Pilots are also required to maintain their own log books and are directed to alert airline management if they are approaching a limit. These systems alert airline management if a pilot is approaching FAA limits.

Additionally, airlines provide training to pilots so that they can accurately recognize the signs of fatigue. It is the professional responsibility of every pilot, if he or she does not feel sufficiently well rested, to say so and not fly. Airlines have non-punitive policies in place that allow pilots to drop the trip if the pilot feels incapable of flying alertly. Backup flight crews are in place specifically for this purpose.

Pilots must maintain this professional responsibility and ethical obligation to passengers and their fellow crewmembers to conduct themselves in a manner that ensures they are well rested. In fact, the great majority of regional airline pilots are consummate professionals that embrace their responsibilities without hesitation and without compromise. While there are strict FAA rules and regulations in place to ensure pilots have enough time off between duty periods, it is the pilot's responsibility to ensure they get enough rest during their time off and to notify the airline promptly in any case where the pilot did not get sufficient rest.

Among the other issues of interest to this Committee, which I would like to review, is pilot compensation.

**Pilot Pay.** The entire airline industry – regional, majors, and low-cost airlines – has a highly unionized work force that is paid a fair and reasonable wage. Pay levels, the option to commute, and virtually all other work rules are negotiated through the collective bargaining process.

The average salary for a regional pilot with the rank of Captain at an RAA member airline is \$76,000 a year. This salary is comparable to other professions that utilize similar skills. For example, according to the Bureau of Labor Statistics, the average salary in the architecture and engineering fields is \$71,430 per year. In the computer industry or in mathematical sciences the average annual salary is \$74,500.

A First Officer has less seniority and responsibility than a Captain. The average salary for a First Officer, working at an RAA member airline, is \$32,000 a year. Again, this salary is in line with comparable professions. The average salary for a paramedic is \$31,980; medical assistants average \$29,060 per year.

Pilots earn a fair and reasonable wage and also receive valuable benefits such as free airline travel, paid leave, and comprehensive benefits. Also, pilots, while on duty, receive collectively-bargained *per diem* expenses.

**Commuting.** Some pilots choose to commute and live away from their crew base, which is the airport from which they will begin and end every flight assignment. In fact, commuting is a common and long-standing practice among crewmembers at all airlines, regional and major.

Whether to commute and what constitutes an acceptable commute is a choice made by each individual crewmember. In fact, the ability to live where they want to and to fly to where they work is a valuable perk that attracts pilots to the profession. It is important to note that, while many pilots commute, many others do not. Commuting is not necessitated by economics. In fact regional airlines have crew bases in dozens of attractive and affordable communities across the country.

On the other hand, those who choose long commutes have a professional responsibility to arrive at work properly rested. As I mentioned earlier, the airlines have non-punitive policies in place to relieve a pilot who is not rested or feels fatigued.

### **Moving Forward: Strategic Safety Initiative**

RAA is a strong supporter of and full participant in the FAA's call to action. At the request of the Administrator, senior officials from the regional airlines, including five RAA member CEOs, attended the FAA's Call to Action meeting on Monday, June 15. The consensus reached at Monday's meeting is that safety is a shared responsibility. In fact, many specific safety objectives discussed at Monday's meeting were already included as part of the Strategic Safety Initiative (discussed in detail below) launched by RAA member airlines last week.

We will continue to support and participate in this valuable dialogue as FAA conducts similar safety summits across the nation this summer, at which we will address our shared safety goals with our partners within labor and government and with our mainline partners.

Indeed, the purpose of the Regional Airline Association's Strategic Safety Initiative is to study and recommend actions responsive to challenges facing the airline industry. The initiative has four elements:

**1. Review Safety Procedures**

The Regional Airline Association will form a task force comprised of safety directors and operations directors from the regional airlines to review safety procedures, giving particular attention to any issue or procedure cited by the NTSB as a contributing factor to any accident.

**2. Study Impact of Fatigue**

RAA will commission a study to look at the impact of fatigue and other human factors on pilot performance. The study will be conducted by an independent and expert organization, in all likelihood a university with a respected aviation program.

The study will be framed by a Strategic Safety Advisory Board comprised of industry experts drawn from the ranks of academia, industry, and safety regulators.

**3. Fatigue Awareness Management Program**

The Regional Airline Association will create a fatigue awareness management program for use by its member airlines.

**4. Recommendations to Congress**

We are committed to working with Congress on this initiative and believe that Congress can provide the aviation industry with additional safety tools, including:

**a. Single Database of Pilot Records**

Requiring the FAA to maintain a single, integrated database of pilot records would provide airlines with critical, real-time information about pilot qualifications and performance, thereby improving the process of recruiting, hiring, and training new pilots.

**b. Random Fatigue Tests**

Airlines are already required to conduct random drug and alcohol tests on pilots. RAA recommends exploring with FAA and all industry stakeholders the concept of random fatigue tests on pilots to help ensure that pilots are indeed rested before flying.

**c. Commuting**

We believe it would be prudent for Congress, working with all stakeholders, to examine commuting in depth, including the possibility of limiting commuting time prior to beginning a work assignment.

**d. Extend Background Check Timeframe**

Under current law, an airline conducting a background check on a pilot can only review the last five years of the pilot's safety records, qualifications, and training. Extending the review period to ten years will help airlines identify safety risks.

**e. Explore Use of Cockpit Voice Recordings for Accident Prevention**

Currently, cockpit voice recordings can be reviewed only as an accident investigation tool, and RAA clearly understands the sensitive privacy issues involved and the years-long debate about access to the CVRs. Yet, as we saw in the flight 3407 accident, pilots have violated the rule requiring sterile cockpit below 10,000 feet. In our collaborative safety effort, stakeholder groups must look at all potential tools to improve flight safety, including reaching out to our employee groups to explore random, non-punitive ways in which this essential information can be used to prevent accidents. Similar to ASAP and other diagnostic preventative safety programs, an initiative permitting random audits could provide valuable information.

**f. Improved Tracking and Analysis of Check Rides**

Current discussion suggests confusion relating to check rides – the image of pilots who have failed check rides continuing to fly aircraft. Every airline pilot is required to pass frequent check-rides during their airline service, and pilots cannot fly until they have successfully completed their required check rides. We believe FAA and the airlines may be able to increase the level of safety through a more detailed analysis of this testing over the entirety of a pilot's career. By working with regulators and the employee groups, the industry may develop a better methodology for assessing pilot performance and instituting remedial training programs that will ensure a higher level of safety.

We will be moving expeditiously to implement this initiative and have already begun compiling a list of aviation experts as candidates for our Strategic Safety Advisory Board. We will keep the Committee informed of these activities.

Mr. Chairman, the Regional Airline Association appreciates the opportunity to testify before the Committee this morning and I welcome any questions you might have.